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June 1, 2023

VIA ECF

Honorable Michael B. Kaplan
United States Bankruptcy Court for the District of New Jersey
402 East State Street Courtroom #8
Trenton, New Jersey 08608

Re: In re LTL Management LLC, Adv. Proc. 23-1092 (MBK)
Order Granting Application to Shorten Time Regarding
Debtor's Motion for Bridge Order Confirming Automatic
Stay Applies to Certain Actions [Dkt. 149]

Dear Chief Judge Kaplan:

I write on behalf of the Debtor with regard to the letters filed this morning by Mr. Placitella [Dkt. 151] and the TCC [Dkt. 152] in response to the Debtor's request for a bridge order [Dkt. 147] (the "Motion"). The Motion requests a temporary stay through the hearing scheduled for June 13, 2023, of the prosecution of several successor-liability actions asserting Debtor talc claims against Janssen Pharmaceuticals, Inc. and Kenvue Inc. — two affiliates of the Debtor that have never had any role in the manufacture or distribution of talc-based products in North America.

Neither of the letters addresses the merits of the Motion. Rather, they argue that one lawyer for the plaintiffs in the successor-liability actions is unavailable tomorrow because he is overseas, and the relief requested in the Motion apparently can wait until the hearing scheduled for June 13, 2023. In that regard, the TCC finds it "hard to imagine any irreparable harm that would befall the Debtor if the Debtor's Motion were heard on June 13th, rather than tomorrow." Mr. Placitella, similarly, requests until June 13 to respond to the Motion. Since the Motion requests only narrow, interim relief through that hearing date, however, both letters effectively request that the Court deny the Motion.

This afternoon, the Middlesex County Court entered its anticipated order allowing all discovery to proceed, including the apex depositions of Kenvue's Chief Executive Officer and Chief Financial Officer and Janssen's Chief Financial Officer, and ordering the defendants to produce these individuals. The court also today entered its order denying the defendants' motion

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to dismiss. Consistent with the Debtor's arguments in the Motion, the court's order denying the motions to quash leaves no doubt that the "central issue" in the cases is "successor liability." A copy of the order is attached hereto as Annex A.

For the reasons described in the Motion, and as supported by the Middlesex County Court's actions today, the requested temporary relief is critical. The relief will temporarily hold at bay plaintiffs' abusive and harassing efforts to take these depositions of key Janssen and Kenvue senior executives on baseless successor-liability claims until the Court has had the benefit of the parties' briefing and arguments at the June 13 hearing. If, as the TCC and Mr. Placitella appear to suggest, the plaintiffs had no intention of taking such actions in violation of the automatic stay before that date, then they will suffer no prejudice by the requested relief.

For these reasons, the Debtor respectfully requests that tomorrow's hearing be maintained, as previously ordered by the Court.

Very truly yours,

/s/ Gregory M. Gordon
Gregory M. Gordon

cc: Counsel of Record (via ECF)